

Claims 1-3 and 6-14 remain pending the application. Claims 1-3 and 6-8 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Decker et al. (U.S.P. 6,137,594). Claims 12-14 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Decker et al.'594 and further in view of Decker et al. (U.S.P. 6,313,925, hereafter "Decker '925"). Claims 9-11 are allowable. Applicant respectfully submits the following arguments in traversal of the prior art rejections.

Applicant's invention relates to color conversion to device-independent image signals representing densities with block dyes. A description of an exemplary embodiment is set forth in the September 2, 2005 Amendment at page 6. Applicant refers the Examiner to these descriptions. The Examiner maintains the rejections of independent claim 6 over Decker '594 and offers a few refinements in the rejection and rebuttal in response to prior submitted arguments.

The Examiner's rebuttal would appear to clarify that the color signals described as "externally defined," such as the color signals CMYK, are being relied upon to teach device independent color signals. However, even taking this interpretation of Decker '594 into account, the rejection cannot be supported. In Decker '594, the color signals described as "externally defined" correspond to signals which are the pre-conversion starting point of a color conversion. The Examiner's own citations at cols. 5-6 indicate that a printer will receive CMYK data that is externally defined and convert the values into color values of a given printer, such as the output printer. Col. 6, lines 2-8 and equation at line 15. Thus Decker teaches conversion from an externally defined space to a device-dependent space. By contrast, claim 1 describes that the

conversion is from device dependent signals to device-independent image signals (as a post - conversion. characterization). Therefore, even assuming *arguendo* that a description of externally defined CMYK corresponds to a device-independent representation, Becker teaches the opposite relation from that described by claim 6.

The Examiner's rebuttal also relies upon a CMY to CMYK conversion to teach use of block dyes. The Examiner relies on col. 4, lines 55-58 to teach this feature. However, the cited portion of col. 4 merely teaches a K ink substitution for CMY inks. Therefore, the prior submitted argument remains valid that the K ink substitution corresponds to a single ink and not multiple block dyes as claimed. The Examiner's reliance on the L\*a\*b\* values at col. 5 also relates to a K-ink substitution once the color signals for C, M, Y are obtained. The Examiner's further reliance on the non-ideal ink substitution at col. 12 also is a variant of a K-ink substitution. All of the above teachings in Becker '594 relate to use of single ink and not multiple block dyes as claimed. Therefore, claim 6 is patentable for this additional reason.

Because claim 1 includes analogous though not necessarily coextensive features as set forth above, claim 1 is also patentable. The remaining claims are patentable based on their dependency.

With further regard to claims 12-14, these claims describe more particularly that the conversion of each color of the device-dependent image signals with multiple block dyes. The Examiner concedes that Decker '594 does not teach this feature but cites Decker '925 to make up for the deficiency. However, Decker '925 merely relates to increasing degrees of black ink

RESPONSE UNDER 37 C.F.R. § 1.116  
Appln. No.: 09/662,900

**Attorney Docket No.: Q58055**

substitution to allow for true color reproduction with the minimum amount of ink. In this regard, Decker '925 cannot make up for any of the deficiencies of Decker '594. It would also appear that the K-ink substitution teaches an opposite relation to that described in claims 12-14. At best, Decker '925 teaches an incomplete relation for the block dyes. Each of claims 12-14 describe a starting point where each color of device dependent space becomes converted to densities with multiple block dyes. By contrast, at best, the K-ink substitution only allows for substitution of a single dye (K, but not each color C,M,Y) for the block dyes. Properly viewed, the relation taught in Decker is either opposite to that claimed or is incomplete relative to the conversion of each color. Therefore, claims 12-14 are patentable for this additional reason.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

RESPONSE UNDER 37 C.F.R. § 1.116  
Appln. No.: 09/662,900

**Attorney Docket No.: Q58055**

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

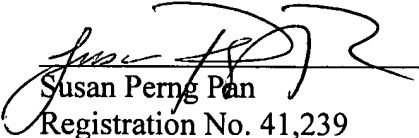
Respectfully submitted,

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

  
Susan Perng Pan  
Registration No. 41,239

Date: April 24, 2006